



# Concerned About Grizzlies

P.O. Box 1736

Hamilton, Montana 59840

406-777-2059 406-777-3214 406-821-3815

406-363-1784 406-961-3951

RECEIVED BY  
AND WILDLIFE  
GRIZZLY BEAR  
COORDINATORS OFFICE

NOV 05 1997

## Member Organizations:

Backcountry Horsemen of Montana  
Bitterroot Backcountry Horsemen  
Bitterroot Chapter-Idaho Outfitters  
Bitterroot Cowbells  
Bitterroot Ridgerunners Snowmobile Club  
Bitterroot Saddle Tramps  
Bitterroot Stockgrowers  
Bitterroot Valley Chamber of Commerce  
Darby Civic Group  
Grassroots For Multiple Use  
Lost Trail Hot Springs Resort  
Lost Trail Ski Area  
Mill Creek Irrigation District  
Montana Chapter-WIFE  
Montana Stockgrowers Assn.  
Montana Wool Growers  
National Cattlemens Assn.  
Ravalli County Commissioners  
Ravalli County Farm Bureau  
Sears Lake Irrigation District  
South Valley Business Assn.  
Western Montana Chapter-WIFE  
Western Montana Horse Council

U. S. Fish and Wildlife Service  
Bitterroot Grizzly Bear EIS  
P. O. Box 5127  
Missoula, Montana 59806

The Draft Environmental Impact Statement concerning Grizzly Bear Recovery in the Bitterroot Ecosystem is far from being realistic. The document is a volume of estimates and wishful thinking.

The Proposed Alternative No. 1, with a Citizen Committee, is a scam, a come-along in order to gain a foothold to control people and land. The Interior Secretary never releases control of the Citizens Committee and can dissolve the committee at his pleasure (DEIS page 2-8).

The membership of the Citizen Committee is unequal. Idaho has the most land, but Montana has the most people exposed. (DEIS figure 1-1, page 1-8) which indicates Ravalli County with an excess of 30,000 citizens would be enclosed within the management area. Just one of the contradictions found in the DEIS as the Alternative No 1, states, "just that area west of Highway 93 is included."

## Co-Chairmen

Ray Karr  
Harold Maus

## Directors:

Jerry Allen  
Steve Benedict  
Gene Broker  
Shirley Bugli  
Tonya Bumbarger  
Steve Christensen  
Charlotte Close  
Elgin Filkins  
Jim Freeman  
Ron Gibford  
Tom Greer  
Art Griffith  
Harvey Hackett  
Claire Kelly  
Steve Kenley  
Ken Kershner  
Merle Lloyd  
Bill Mitchell  
Bud Richards  
Bob Steel  
Bob Stewart  
Bob Thomas  
Larry Trexler  
Smut Warren

Alternative No. 1, states a Grizzly can be killed in self defense or in defense of others. However, the United States Fish and Wildlife Service (U.S.F.W.S.) vs Shuler, the defendant was fined \$4,200.00 plus attorney fees for killing a Grizzly in his sheep pens at his home complex. Part of the verdict, "Mr. Shuler endangered himself when he stepped off of his porch". No lawyer seeking greater fees from organizations supported by tax free donations is going to pass up this precedent. The U.S.F.W.S. is going to assist (DEIS Appendix 14-B2113, page 6-15) means each Grizzly kill will be taken to the max to prosecute.

The DEIS plainly indicates that citizens become second class, subservient to the Grizzly bear. The citizens personal safety, protection of personal property, peace of mind and their rights under the 5th and 10th Amendment to the U. S. Constitution are waived.

The section of the DEIS concerning human health and safety is a perfect example of estimation based on wishful thinking.

No **GRIZZLY** Reintroduction!!!

Grizzly bear have made greater use of river bottoms (DEIS 4-14 Jonkel 1984). Grizzly bears crossing the divide of the Bitterroot Mountains will find numerous canyons representing the gateway into the Bitterroot Valley, at the mouth of some canyons are cattle and horse ranches, at others are developments with many residents. The DEIS does not discuss these canyons nor the fact the most vegetation is found in the canyon floor, that the canyon walls in many cases are solid rock or long talus slides. There are only steep foothills on the Bitterroot Mountain east slope with much decomposed granite soil with low fertility. These canyons are the site for trails leading into the Wilderness area, many are perilous at best and are heavily used by day hikers, rock climbers, picnicians, fisherman and irrigators servicing their water storage.

In the fall hunters and guides use these trails. One lonesome Grizzly could create a disaster to a train of pack stock as there is no easy retreat for the bear or humans and their stock.

4 The Intersection of Highway 93 and Main Street of Hamilton, MT is six air miles from the Wilderness border. The elevation difference is approximately 4,000 feet. Snow is present at that elevation in late fall and early spring, so the Grizzly food source is downhill, where the people are. The forest boundary is four miles from the above mentioned intersection with residencies to the forest border. No mention of these conditions can be found in the DEIS.

Human/bear conflict is just a minor statistic in the DEIS. However a mauling can mean a lifetime of scars, pain and medical expenditures. Death may be a statistic to the U.S.F.W.S. but is a senseless tragedy to the relatives and friends of the victim.

5 Whole communities are placed within the suggested management area which includes schools. Does the U.S.F.W.S. expect mothers to be present with pepper spray during all recesses? Public buildings and other gathering places are included. The risk is just too great to allow.

5 The efforts in the DEIS to lead the citizens to consider the Selway-Bitterroot Wilderness as prime Grizzly bear habitat is misleading. (DEIS Thwaites 1959, page 1-5) Lewis and Clark killed 7 Grizzly bear near present day Kamiah, Idaho. The DEIS fails to show elevation differential between the Wilderness and Kamiah which is more than 3,000 feet. Early spring in the higher wilderness area has 5 to 11 feet of snow with the grass green in Kamiah.

6 The Selway Bitterroot Wilderness with it's deep canyons, long dry ridges and miles of solid rock has an Eco-System of it's own. Introduction of Grizzly bear is not Eco-System management, but is Eco-System manipulation. This area was long primitive area prior to becoming Wilderness in 1964. Therefore, it seems realistic that Grizzly would inhabit the area if it was prime habitat.

7 How wise is it to change the Eco-System which exists. Grizzlies are the acme of the food chain and it's desires will happen. They like elk, moose and deer young.

8

Those ungulates, without reproduction, will soon be endangered. (DEIS Mattson et al 1992 page 4-13) found that Grizzly bears are known to kill and eat black bear. This together with (Jonkel 1984, DEIS page 4-14) indicates that the two bear families don't do well together. Although the DEIS discussed this issue, it does not address their assumed knowledge that black bears will seek new localities where they will prey on other ungulates further changing the present balanced eco-system. Black bear, as their numbers become more confined, have been known to acquire a great taste for livestock. Check Grand Mesa in Colorado during the early 1950's.

9

The DEIS brings forth some utterly fantastic economic forecasts. The method arriving at the 50 million dollar value for introduction of Grizzly bear leaves much to be considered. Unless the ultimate plan by the U.S.F.W.S. is to have the Grizzlies standing along Highway 93 in the Bitterroot Valley or along Idaho 14, in the Red River Valley to wave to the tourists. Who would enter the Wilderness paying a guide to look for Grizzly when they can drive to Yellowstone or Glacier Parks, where a successful viewing is much greater.

The comparison used to arrive at these estimates (DEIS appendix 17, Duda, M.D. and K.C. Young, pages 6-177 is nothing but an exercise in maybe's.

There exists in the Selway-Bitterroot Wilderness a very solid general economy. General meaning the hunters economic contribution to home communities, pickups, trailers and other supplies. Travel expenses, some travel completely across the nation and to the local communities for fuel, food and guide services. Anyone doubting this should monitor some of the access areas into the Wilderness for the Idaho hunting season.

Livestock loss is considered not important. The preparers of the DEIS apparently are not aware as to how small the profit margin for a rancher can be. In Montana each cow is a taxpayer. The loss of one or more effects the economy of not only the rancher, but the community and state as well.

The Montana Fish, Wildlife and Parks has managed the Grizzly Bear as a game animal, monitoring it's numbers so that an over abundance did not cause conflicts nor become extinct. Federal interference has caused controversy and conflict.

10

The Chosen Alternative would allow non-elected members to make decisions concerning land use (DEIS page 2-9). This alternative has the guideline for closure of access (DEIS page 2-13) (DEIS page 2-14) (Appendix 14-B224, B225) although the drafters indicate it couldn't happen.

11

In the opinion of this writer, the required determinations have not been met. Only speculation, estimations and maybe are offered. Land use regulations do not specify that Executive Order 12630 be strictly adhered to. The Montana Fish, Wildlife and Parks are operating under an unfunded mandate at great cost to Montana tax payers.

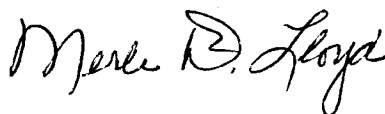
The Clinton Administration is calling for millions of dollars to be used for Children welfare. How can a million dollar expenditure introducing Grizzly bears to endanger western Montana children be justified. Grizzly bear do kill people.

This attempt to introduce Grizzly bear into the Selway-Bitterroot Wilderness by the U.S.F.W.S. is in violation of Section 4, Public Law 88-577 (16 U.S.C. 1133) which states: "Nothing in this act shall be construed as affecting the jurisdiction of responsibilities of the several states with respect to wildlife and fish in the national forest".

I oppose Grizzly Bear introduction into the Selway-Bitterroot Wilderness Area. Arbitrary decisions by un-elected agencies must not be allowed to over ride the peoples' elected representatives if the Republic is to survive.

One, and only one, Grizzly Bear in the right place at the wrong time can cause a tragedy.

Respectfully submitted,



Merle D. Lloyd

1034 Hamilton Heights  
Corvallis, MT 59828

Dated: October 27, 1997